ORIGINAL
Supreme Court, U.S.
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No. 93-1833

In the

Supreme Court of the United States

October Term, 1993

CITIZENS FOR TERM LIMITS,
Petitioner,

v.

THOMAS FOLEY, JOHN CLUTE, GEORGE CHEEK, LEAGUE OF WOMEN VOTERS OF WASHINGTON, MARGARET COLONY, TIMOTHY S. ZENK, WILLIAM FIRST, and SUSAN THORSTED, et al.,
Respondents.

Petition for Writ of Certiorari to the Court of Appeals, Ninth Circuit

MOTION TO EXPEDITE CONSIDERATION

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Pursuant to Rule 21 of the Rules of this Court, petitioner Citizens for Term Limits respectfully moves this Court to expedite the consideration of the petition for writ of certiorari in this case so that it may be discussed at the June 17, 1994, conference.

Petitioner has been informed by Frank Lorson, a clerk of this Court, that petitions for writ of certiorari filed in Docket No. 93-1456 (*U.S. Term Limits v. Thornton*) and Docket No. 93-1828 (*State of Arkansas ex rel. Winston Bryant v. Hill*), both of which involve the constitutionality of an Arkansas initiative limiting ballot access to longtime incumbents, have been scheduled for conference on June 17, 1994.

The petition in the instant case also addresses the issue of the constitutionality of a Washington initiative that limits ballot access to longtime incumbents. Because of the similarity in subject matter to the Arkansas initiative, petitioner in this case filed the instant petition at a time that would allow it to be considered concurrently with the petitions in the cases noted above. The respondents to the petition in this case would suffer no prejudice from the granting of this motion because Thomas Foley, *et al.*, primary respondents to this petition, filed their response to the petition on or about June 8, 1994. Respondents LIMIT and Sherry Bockwinkel; and respondents Thomas Foley and all plaintiffs below have authorized Citizens for Term Limits to state that they join in this motion to expedite consideration.

Petitioner has also been informed by Mr. Lorson that ordinarily the petition for writ of certiorari filed by the State of Washington from the same judgment as the instant case (*Gregoire v. Thorsted*, Docket No. 93-1955) on or about June 3, 1994, would extend the time for the conference on the petition in this case. However, petitioner understands that

the State of Washington will be filing a motion to expedite consideration of the *Gregoire v. Thorsted* petition concurrent with this motion. Because the State's petition addresses the same lower court decision to which the primary respondents have already submitted a response to this Court in this case, no prejudice would result from expediting both of the petitions dealing with the Washington initiative.

For the reasons stated herein, petitioner Citizens for Term Limits respectfully requests that the motion to expedite be granted.

DATED: June 9, 1994.

Respectfully submitted,

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By /s/ Deborah J. La Fetra
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DECLARATION OF SERVICE BY MAIL

I, Dana M. Olsen, declare as follows:

I am a resident of the State of California, residing or employed in Sacramento, California.

I am over the age of 18 years and am not a party to the above-entitled action.

My business address is 2151 River Plaza Drive, Suite 305, Sacramento, California.

On June 9, 1994, true copies of MOTION TO EXPEDITE CONSIDERATION were placed in envelopes addressed to:

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which envelopes, with postage thereon fully prepaid, were then sealed and deposited in a mailbox regularly maintained by the United States Postal Service in Sacramento, California.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 9th day of June, 1994, at Sacramento, California.

Dana M Olsen
DANA M. OLSEN